

LOOMIS, EWERT, PARSLEY, DAVIS & GOTTING

DOCKET FILE COPY ORIGINAL

A PROFESSIONAL CORPORATION

232 SOUTH CAPITOL AVENUE, SUITE 1000

LANSING, MICHIGAN 48933-1525

TELEPHONE: (517) 482-2400

FACSIMILE: (517) 482-7227

JACK C. DAVIS, PC  
KARL L. GOTTING, PC  
DAVID M. LICK  
HARVEY J. MESSING  
JAMES R. NEAL  
KENNETH W. BEALL  
MICHAEL G. OLIVA  
JEFFREY W. BRACKEN  
CATHERINE A. JACOBS  
RONALD W. BLOOMBERG  
MICHAEL H. RHODES  
HOWARD J. SOIFER

JEFFREY L. GREEN  
GARY L. FIELD  
SHERRI A. WELLMAN  
KELLY K. REED  
JEFFREY S. THEUER  
DANIEL L. PULTER  
ELDONNA M. RUDDOCK  
KEVIN J. RORAGEN  
THERESA A. PARKER  
SCOTT R. NANNINI  
JARED A. ROBERTS

PLUMMER SNYDER  
(1900-1974)

GEORGE W. LOOMIS  
WILLIAM D. PARSLEY  
QUENTIN A. EWERT  
OF COUNSEL

SUE ANN GEIERSBACH  
OF COUNSEL-SPECIAL PROJECTS

RECEIVED

MAR 29 2000

FCC MAIL ROOM

March 28, 2000

Ms. Magalie Roman Salas, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW, TW-A325  
Washington, DC 20554

**FEDERAL EXPRESS**

Re: Truth-in-Billing and Billing Format, CC Docket No. 98-170

Dear Ms. Salas,

Yesterday, we expressed for filing a Joint Petition for Extension of Time and/or Temporary Waiver on behalf of Kaleva Telephone Company, Westphalia Telephone Company, Sand Creek Telephone Company, Winn Telephone Company, Waldron Telephone Company, Blanchard Telephone Association, Inc., and Ogden Telephone Company. We inadvertently failed to enclose Exhibit A to said Petition. Accordingly, enclosed is an original and six copies of Exhibit A. We apologize for the inconvenience.

Very truly yours,

LOOMIS, EWERT, PARSLEY,  
DAVIS & GOTTING, P.C.

*Gary L. Field*  
Gary L. Field

GLF:blp

cc w/encl: FCC Commissioners  
Individuals on Proof of Service

No. of Copies rec'd 0 + 5  
List ABCDE

DOCKET FILE COPY ORIGINAL

Exhibit A



215 East Hickory Street P.O. Box 772 Mankato, MN 56002-0772

March 8, 2000

Mr. Duane Bronson  
Blanchard Telephone Co.  
425 Main Street  
P.O. Box 67  
Blanchard, MI 49310-0067

Ph: 507.625.1691  
Fax: 507.625.1057  
[www.nibinc.com](http://www.nibinc.com)

Dear Duane:

The FCC adopted the Truth in Billing Order that will be applicable to all telecommunications wireline carriers. FCC has mandated Truth in Billing to be implemented on April 1, 2000 by all NIBI customers. NIBI acknowledges Truth in Billing and is taking action to help its NIBI customers move toward compliance with the Truth in Billing Regulations. In order to help all NIBI customers move toward becoming compliant, NIBI will provide the option to add enhancements to all current systems.

An assessment, NECA Time and Cost Estimate form, and Illuminet surveys are being provided to all NIBI customers. The assessment provides information on the enhancements to NIBI systems as part of the Truth in Billing requirements. The NECA Time and Cost Estimate and Illuminet surveys will provide the information that NIBI customers may be required to submit. The amount provided for NECA's Time and Cost Estimate reflects only the amount it will take NIBI to enhance systems as part of Truth in Billing requirements. If needed, your additional costs may be added to NECA's Time and Cost Estimate.

Currently, NIBI is updating the Telco Billing and Rating systems to be able to process the 020-A module (used for notification on any Service Provider change). NIBI has set the implementation date for 020-A module use to June 1, 2000.

If any NIBI customers will not be compliant as of April 1, 2000 as mandated by the FCC, a bill insert will need to be provided in all customer bills stating the Truth in Billing Regulations, that the bills are not yet compliant and the reason(s) for not being compliant. For EasyTel, and EasyTel2000, a 34-line user-defined statement message is available for creating the billing insert. If the statement message is used and it creates an additional page, the NIBI charge for printing the additional page is \$.05. If any NIBI customer wishes to use a pre-printed billing insert for customer notification, the cost will be \$.05 per insert plus the cost of producing the billing insert.

NIBI is not guaranteeing compliance with Truth in Billing Regulations, but is striving to help its customers move towards becoming compliant. If any NIBI customer needs to submit a waiver to the FCC for the April 1, 2000 requirements, it will be their responsibility to contact the FCC for waiver submission information.

As a way of helping NIBI customers understand Truth in Billing, NIBI will be setting up conference calls to help answer any questions. We will be sending you a notification of the conference time by next week.

If you have any questions regarding this information, please contact NIBI Customer Support at (507) 388-0250.

Sincerely,

NATIONAL INDEPENDENT BILLING, INC.

Vicki Sutherland  
Business Support Supervisor

**NATIONAL INDEPENDENT  
BILLING INCORPORATED****A Subsidiary of Hickory Tech Corporation****PROJECT ASSESSMENT**

---

**TO:** Duane Bronson, Blanchard Telephone Co.  
**FROM:** National Independent Billing, Incorporated (NIBI)  
**SUBJECT:** Truth in Billing Requirements  
**DATE:** March 8, 2000  
**OVERVIEW:** Adriana Maldonado, NIBI Business Analyst  
**HOURS/DOLLARS:** Marlys Mackey, Project Administrator

---

**OVERVIEW:**

Changes will need to be made to the NIBI EasyTel, Toll Rating and Billing systems as a result of the Truth in Billing Regulations, currently being implemented on April 1, 2000. NIBI is not guaranteeing compliance with Truth in Billing Regulations through this document. This assessment will focus on the requirements of Truth in Billing, system changes needed to meet the requirements, and the options that are available for these requirements as methods that may be used to move toward compliance of the Truth in Billing Regulations.

Following are the five main requirements identified by NIBI:

1. Clear identification of the name of the Service Provider associated with each charge on the customer's bill.
2. A brief, clear, plain language description of the services included on the customer's bill.
3. Prominent display on the bill of a toll-free number (or numbers) by which customers may inquire or dispute any charge on the bill.
4. Clear and conspicuous notification of any change in Service Providers (Service Providers that did not bill for services on the previous billing statement) including, where appropriate, any new presubscribed or continuing relationship with the customer.
5. A differentiation between deniable and non-deniable charges.

The Project Assessment and scheduled release date are based upon the following statements:

**SYSTEM CHANGES:**

System changes will be needed for EasyTel, Toll Rating and Toll Billing systems.

I:\private\opensys\or\09911ec.doc

*Easytel**imf file table*  
Requirement #1 – Identify Service Provider with each charge

- Identifying the Service Provider with each charge can be handled through setup. No coding changes will be needed.

*ni*  
Requirement #2 – Clear description of services

- Clear description of service can be handled through setup. No coding changes will be needed.

## Requirement #3 – Display toll-free number

- Identifying the toll-free number with each charge can be handled through setup. No coding changes will be needed.

## Requirement #4 – Notification of Service Provider Change

- Existing functionality may be used to notify the new service provider. No coding changes will be needed for to notify a service provider change.

## Requirement #5 – Differentiation between deniable and non-deniable charges

- Identifying the deniable and non-deniable charges can be handled through setup. No coding changes will be needed.

*Net Comp*  
*or*  
Telco Rating

## Requirement #1 – Identify Service Provider with each charge

- System changes will be needed to provide the ability to process 002-B module for identifying Service Provider information on CDR's.

## Requirement #2 – Clear description of services

- This requirement is not applicable for telco rating.

## Requirement #3 – Display toll-free number

- This requirement is not applicable for telco rating.

## Requirement #4 – Notification of Service Provider Change

- System changes will be needed to process the 020-A module and pass the new service provider indicator to telco billing.

## Requirement #5 – Differentiation between deniable and non-deniable charges

- This requirement is not applicable for telco rating.

*Not Easy*  
Telco Billing

## Requirement #1 – Identify Service Provider with each charge

- System changes will be needed to process 9 digit cic (4 = cic, 5 = subcic) values. System changes will be needed to interrogate the subcic information to be presented on the bill.

## Requirement #2 – Clear description of services

- This requirement is not applicable for telco billing.

## Requirement #3 – Display toll-free number

- Displaying the toll-free number can be handled through setup. No coding changes will be needed.

**Requirement # 4 – Notification of Service Provider Change**

- System changes will be needed to process and check the new service provider indicator and present who the new provider is and place the message on the toll detail page.

**Requirement # 5 – Differentiation between deniable and non-deniable charges**

- Currently, telco billing displays a message pertaining to deniable charges for customers that have 900 messages.

**RECOMMENDATIONS:**

Currently, there are options available in the system to move toward the Truth in Billing requirements. No code changes are necessary for these options, only set up changes.

**Requirement # 1 – Identify Service Provider with each charge**

- The Vendor Code description can be used to identify the service provider on the local service bill. If the Vendor Code description is used, the Vendor Code switch will need to be set to 'Y' for "Itemize" and respond with 'Y' to "Itemize All Subscribers" when creating laser statements to get a fully itemized bill.

**Requirement # 2 – Clear description of services**

- Item charge codes may also be used to identify the description of services.
- Itemization can be set up on an individual basis or for all residential or business customers within a cycle.

**Requirement # 3 – Display toll-free number**

- Statement messages may be used to identify a toll-free number.
- For telco billing, the phone number that is printed on each toll detail statement can be used as the toll-free number.

**Requirement # 4 – Notification of Service Provider Change**

- Code change will be needed to notify a service provider change.

**Requirement # 5 – Differentiation between deniable and non-deniable charges**

- Statement messages may be used to identify the deniable and non-deniable charges. Currently, there is a 34-line customer message available in addition to the two-line statement message.
- In conjunction with the statement messages, an '\*' can be placed in front of the description for either deniable or non-deniable charges. A brief description can be placed in the statement messages explaining the charges with an '\*' indicator.
- The Vendor Code description can be used to identify the deniable and non-deniable charges on the local service bill. If the Vendor Code description is used, the Vendor Code switch will need to be set to 'Y' for "Itemize" and respond with 'Y' to "Itemize All Subscribers" when creating laser statements to get a fully itemized bill.

**NOTE:** If you have any questions regarding this information, please contact NIBI Customer Support at (507) 388-0250.

The Project Assessment reflects an hour/dollar range for completion of the project.

Requirement # 1	<u>\$630.00</u>	to	<u>\$795.00</u>
Requirement # 2	<u>0</u>	to	<u>0</u>
Requirement # 3	<u>0</u>	to	<u>0</u>
Requirement # 4	<u>\$240.00</u>	to	<u>\$330.00</u>
Requirement # 5	<u>0</u>	to	<u>0</u>
Total Dollar Range will be	<u>\$ 870.00</u>	to	<u>\$1125.00</u>

This assessment is valid for 45 days from signature date. In the event that the design phase indicates the project cannot be completed in the estimated time, a new Project Assessment will be prepared. The customer then has an option to approve the new Project Assessment or pay for hours incurred for the design phase.

NIBI will provide documentation of all Project Assessment hours through normal job accounting reporting, and NIBI will retain all proprietary rights to software modifications made at the request of the customer, including the right to copy and distribute the software.

Your signature below authorizes NIBI to proceed with this project.

Customer Signature  
Blanchard Telephone Co.

Date

NIBI Signature

Date

*Ray Brans/mm* 3-8-00



215 East Hickory Street P.O. Box 772 Mankato, MN 56002-0772

March 8, 2000

Mr. Harry Cribbs  
Kaleva Telephone Company  
9462 Osmo Street  
P.O. Box 6  
Kaleva, MI 49645-0006

Ph: 507.625.1691  
Fax: 507.625.1057  
www.nibinc.com

Dear Harry:

The FCC adopted the Truth in Billing Order that will be applicable to all telecommunications wireline carriers. FCC has mandated Truth in Billing to be implemented on April 1, 2000 by all NIBI customers. NIBI acknowledges Truth in Billing and is taking action to help its NIBI customers move toward compliance with the Truth in Billing Regulations. In order to help all NIBI customers move toward becoming compliant, NIBI will provide the option to add enhancements to all current systems.

An assessment, NECA Time and Cost Estimate form, and Illuminet surveys are being provided to all NIBI customers. The assessment provides information on the enhancements to NIBI systems as part of the Truth in Billing requirements. The NECA Time and Cost Estimate and Illuminet surveys will provide the information that NIBI customers may be required to submit. The amount provided for NECA's Time and Cost Estimate reflects only the amount it will take NIBI to enhance systems as part of Truth in Billing requirements. If needed, your additional costs may be added to NECA's Time and Cost Estimate.

Currently, NIBI is updating the Telco Billing and Rating systems to be able to process the 020-A module (used for notification on any Service Provider change). NIBI has set the implementation date for 020-A module use to June 1, 2000.

If any NIBI customers will not be compliant as of April 1, 2000 as mandated by the FCC, a bill insert will need to be provided in all customer bills stating the Truth in Billing Regulations, that the bills are not yet compliant and the reason(s) for not being compliant. For EasyTel, and EasyTel2000, a 34-line user-defined statement message is available for creating the billing insert. If the statement message is used and it creates an additional page, the NIBI charge for printing the additional page is \$.05. If any NIBI customer wishes to use a pre-printed billing insert for customer notification, the cost will be \$.05 per insert plus the cost of producing the billing insert.

NIBI is not guaranteeing compliance with Truth in Billing Regulations, but is striving to help its customers move towards becoming compliant. If any NIBI customer needs to submit a waiver to the FCC for the April 1, 2000 requirements, it will be their responsibility to contact the FCC for waiver submission information.

As a way of helping NIBI customers understand Truth in Billing, NIBI will be setting up conference calls to help answer any questions. We will be sending you a notification of the conference time by next week.

If you have any questions regarding this information, please contact NIBI Customer Support at (507) 388-0250.

Sincerely,

NATIONAL INDEPENDENT BILLING, INC.

Vicki Sutherland  
Business Support Supervisor

**NATIONAL INDEPENDENT  
BILLING INCORPORATED**

A Subsidiary of Hickory Tech Corporation

**PROJECT ASSESSMENT**

---

**TO:** Harry Cribbs, Kaleva Telephone Company  
**FROM:** National Independent Billing, Incorporated (NIBI)  
**SUBJECT:** Truth in Billing Requirements  
**DATE:** March 8, 2000  
**OVERVIEW:** Adriana Maldonado, NIBI Business Analyst  
**HOURS/DOLLARS:** Marlys Mackey, Project Administrator

---

**OVERVIEW:**

Changes will need to be made to the NIBI EasyTel, Toll Rating and Billing systems as a result of the Truth in Billing Regulations, currently being implemented on April 1, 2000. NIBI is not guaranteeing compliance with Truth in Billing Regulations through this document. This assessment will focus on the requirements of Truth in Billing, system changes needed to meet the requirements, and the options that are available for these requirements as methods that may be used to move toward compliance of the Truth in Billing Regulations.

Following are the five main requirements identified by NIBI:

1. Clear identification of the name of the Service Provider associated with each charge on the customer's bill.
2. A brief, clear, plain language description of the services included on the customer's bill.
3. Prominent display on the bill of a toll-free number (or numbers) by which customers may inquire or dispute any charge on the bill.
4. Clear and conspicuous notification of any change in Service Providers (Service Providers that did not bill for services on the previous billing statement) including, where appropriate, any new presubscribed or continuing relationship with the customer.
5. A differentiation between deniable and non-deniable charges.

The Project Assessment and scheduled release date are based upon the following statements:

**SYSTEM CHANGES:**

System changes will be needed for EasyTel, Toll Rating and Toll Billing systems.

I:\private\opensys\lor\09911ec.doc



***Easynet*****Requirement #1 – Identify Service Provider with each charge**

- Identifying the Service Provider with each charge can be handled through setup. No coding changes will be needed.

**Requirement # 2 – Clear description of services**

- Clear description of service can be handled through setup. No coding changes will be needed.

**Requirement # 3 – Display toll-free number**

- Identifying the toll-free number with each charge can be handled through setup. No coding changes will be needed.

**Requirement # 4 – Notification of Service Provider Change**

- Existing functionality may be used to notify the new service provider. No coding changes will be needed for to notify a service provider change.

**Requirement # 5 – Differentiation between deniable and non-deniable charges**

- Identifying the deniable and non-deniable charges can be handled through setup. No coding changes will be needed.

***Telco Rating*****Requirement #1 – Identify Service Provider with each charge**

- System changes will be needed to provide the ability to process 002-B module for identifying Service Provider information on CDR's.

**Requirement # 2 – Clear description of services**

- This requirement is not applicable for telco rating.

**Requirement # 3 – Display toll-free number**

- This requirement is not applicable for telco rating.

**Requirement # 4 – Notification of Service Provider Change**

- System changes will be needed to process the 020-A module and pass the new service provider indicator to telco billing.

**Requirement # 5 – Differentiation between deniable and non-deniable charges**

- This requirement is not applicable for telco rating.

***Telco Billing*****Requirement #1 – Identify Service Provider with each charge**

- System changes will be needed to process 9 digit cic (4 = cic, 5 = subcic) values. System changes will be needed to interrogate the subcic information to be presented on the bill.

**Requirement # 2 – Clear description of services**

- This requirement is not applicable for telco billing.

**Requirement # 3 – Display toll-free number**

- Displaying the toll-free number can be handled through setup. No coding changes will be needed.

**Requirement # 4 – Notification of Service Provider Change**

- System changes will be needed to process and check the new service provider indicator and present who the new provider is and place the message on the toll detail page.

**Requirement # 5 – Differentiation between deniable and non-deniable charges**

- Currently, telco billing displays a message pertaining to deniable charges for customers that have 900 messages.

**RECOMMENDATIONS:**

Currently, there are options available in the system to move toward the Truth in Billing requirements. No code changes are necessary for these options, only set up changes.

**Requirement #1 – Identify Service Provider with each charge** *END OF 3RD Qtr.*

- The Vendor Code description can be used to identify the service provider on the local service bill. If the Vendor Code description is used, the Vendor Code switch will need to be set to 'Y' for "Itemize" and respond with 'Y' to "Itemize All Subscribers" when creating laser statements to get a fully itemized bill.

**Requirement # 2 – Clear description of services** *we have control of this ourselves.*

- Item charge codes may also be used to identify the description of services.
- Itemization can be set up on an individual basis or for all residential or business customers within a cycle.

**Requirement # 3 – Display toll-free number** *immed*

- Statement messages may be used to identify a toll-free number.
- For telco billing, the phone number that is printed on each toll detail statement can be used as the toll-free number.

**Requirement # 4 – Notification of Service Provider Change**

- Code change will be needed to notify a service provider change. *NIBI CHANGE June 1*

**Requirement # 5 – Differentiation between deniable and non-deniable charges** *immediately*

- Statement messages may be used to identify the deniable and non-deniable charges. Currently, there is a 34-line customer message available in addition to the two-line statement message.
- In conjunction with the statement messages, an '\*' can be placed in front of the description for either deniable or non-deniable charges. A brief description can be placed in the statement messages explaining the charges with an '\*' indicator.
- The Vendor Code description can be used to identify the deniable and non-deniable charges on the local service bill. If the Vendor Code description is used, the Vendor Code switch will need to be set to 'Y' for "Itemize" and respond with 'Y' to "Itemize All Subscribers" when creating laser statements to get a fully itemized bill.

**NOTE:** If you have any questions regarding this information, please contact NIBI Customer Support at (507) 388-0250.

The Project Assessment reflects an hour/dollar range for completion of the project.

Requirement # 1	\$630.00	to	\$795.00
Requirement # 2	0	to	0
Requirement # 3	0	to	0
Requirement # 4	\$240.00	to	\$330.00
Requirement # 5	0	to	0
Total Dollar Range will be	\$ 870.00	to	\$1125.00

This assessment is valid for 45 days from signature date. In the event that the design phase indicates the project cannot be completed in the estimated time, a new Project Assessment will be prepared. The customer then has an option to approve the new Project Assessment or pay for hours incurred for the design phase.

NIBI will provide documentation of all Project Assessment hours through normal job accounting reporting, and NIBI will retain all proprietary rights to software modifications made at the request of the customer, including the right to copy and distribute the software.

Your signature below authorizes NIBI to proceed with this project.

Customer Signature  
Kaleva Telephone Company

Date

NIBI Signature

Date

*Ray Williams/mm* 3800

**BILLING INSERT SAMPLE USING STATEMENT MESSAGES****TRUTH-IN-BILLING REGULATIONS**

New FCC regulations have taken effect which require telephone companies to reformat their customer bills in order to provide:

- Clear identification of the name of the Service Provider associated with each charge.
- A brief, clear, plain language description of the services included on the customer's bill.
- Prominent display on the bill of a toll-free number (or numbers) by which customers may inquire or dispute any charge on the bill.
- Clear and conspicuous notification of any change in Service Providers (Service Providers that did not bill for services on the previous billing statement).
- A differentiation between deniable and non-deniable charges.

**HOW WE ARE COMPLYING:**

- We continue to try to provide a bill that is as clear and understandable as possible. We are completing computer and systems work necessary to make the changes to reflect the FCC Truth-In-Billing regulations.
- We have not yet changed your bill to list the name and contact number of dial-around or alternative operator service providers. In such instances, if these charges appear on our bill, we will respond to your inquiries at the following toll-free number.



A Subsidiary of Hickory Tech Corporation

215 East Hickory Street P.O. Box 772 Mankato, MN 56002-0772

March 8, 2000

Ms. Linda Corie  
Ogden Telephone Company  
4726 East Weston Road  
Blissfield, MI 49228

Ph: 507.625.1691

Fax: 507.625.1057

www.nibinc.com

Dear Linda:

The FCC adopted the Truth in Billing Order that will be applicable to all telecommunications wireline carriers. FCC has mandated Truth in Billing to be implemented on April 1, 2000 by all NIBI customers. NIBI acknowledges Truth in Billing and is taking action to help its NIBI customers move toward compliance with the Truth in Billing Regulations. In order to help all NIBI customers move toward becoming compliant, NIBI will provide the option to add enhancements to all current systems.

An assessment, NECA Time and Cost Estimate form, and Illuminet surveys are being provided to all NIBI customers. The assessment provides information on the enhancements to NIBI systems as part of the Truth in Billing requirements. The NECA Time and Cost Estimate and Illuminet surveys will provide the information that NIBI customers may be required to submit. The amount provided for NECA's Time and Cost Estimate reflects only the amount it will take NIBI to enhance systems as part of Truth in Billing requirements. If needed, your additional costs may be added to NECA's Time and Cost Estimate.

Currently, NIBI is updating the Telco Billing and Rating systems to be able to process the 020-A module (used for notification on any Service Provider change). NIBI has set the implementation date for 020-A module use to June 1, 2000.

If any NIBI customers will not be compliant as of April 1, 2000 as mandated by the FCC, a bill insert will need to be provided in all customer bills stating the Truth in Billing Regulations, that the bills are not yet compliant and the reason(s) for not being compliant. For EasyTel, and EasyTel2000, a 34-line user-defined statement message is available for creating the billing insert. If the statement message is used and it creates an additional page, the NIBI charge for printing the additional page is \$.05. If any NIBI customer wishes to use a pre-printed billing insert for customer notification, the cost will be \$.05 per insert plus the cost of producing the billing insert.

NIBI is not guaranteeing compliance with Truth in Billing Regulations, but is striving to help its customers move towards becoming compliant. If any NIBI customer needs to submit a waiver to the FCC for the April 1, 2000 requirements, it will be their responsibility to contact the FCC for waiver submission information.

As a way of helping NIBI customers understand Truth in Billing, NIBI will be setting up conference calls to help answer any questions. We will be sending you a notification of the conference time by next week.

If you have any questions regarding this information, please contact NIBI Customer Support at (507) 388-0250.

Sincerely,

NATIONAL INDEPENDENT BILLING, INC.

Vicki Sutherland  
Business Support Supervisor



A Subsidiary of Hickory Tech Corporation

215 East Hickory Street P.O. Box 772 Mankato, MN 56002-0772

March 8, 2000

Ms. Margie Gallatin  
Sand Creek Telephone Co.  
6525 Sand Creek Highway  
P.O. Box 66  
Sand Creek, MI 49279-0066

**RECEIVED****MAR 13 2000** *Mg*

SAND CREEK TEL. CO.

Ph: 507.625.1691

Fax: 507.625.1057

www.nibinc.com

Dear Margie:

The FCC adopted the Truth in Billing Order that will be applicable to all telecommunications wireline carriers. FCC has mandated Truth in Billing to be implemented on April 1, 2000 by all NIBI customers. NIBI acknowledges Truth in Billing and is taking action to help its NIBI customers move toward compliance with the Truth in Billing Regulations. In order to help all NIBI customers move toward becoming compliant, NIBI will provide the option to add enhancements to all current systems.

An assessment, NECA Time and Cost Estimate form, and Illuminet surveys are being provided to all NIBI customers. The assessment provides information on the enhancements to NIBI systems as part of the Truth in Billing requirements. The NECA Time and Cost Estimate and Illuminet surveys will provide the information that NIBI customers may be required to submit. The amount provided for NECA's Time and Cost Estimate reflects only the amount it will take NIBI to enhance systems as part of Truth in Billing requirements. If needed, your additional costs may be added to NECA's Time and Cost Estimate.

Currently, NIBI is updating the Telco Billing and Rating systems to be able to process the 020-A module (used for notification on any Service Provider change). NIBI has set the implementation date for 020-A module use to June 1, 2000.

If any NIBI customers will not be compliant as of April 1, 2000 as mandated by the FCC, a bill insert will need to be provided in all customer bills stating the Truth in Billing Regulations, that the bills are not yet compliant and the reason(s) for not being compliant. For EasyTel, and EasyTel2000, a 34-line user-defined statement message is available for creating the billing insert. If the statement message is used and it creates an additional page, the NIBI charge for printing the additional page is \$.05. If any NIBI customer wishes to use a pre-printed billing insert for customer notification, the cost will be \$.05 per insert plus the cost of producing the billing insert.

NIBI is not guaranteeing compliance with Truth in Billing Regulations, but is striving to help its customers move towards becoming compliant. If any NIBI customer needs to submit a waiver to the FCC for the April 1, 2000 requirements, it will be their responsibility to contact the FCC for waiver submission information.

As a way of helping NIBI customers understand Truth in Billing, NIBI will be setting up conference calls to help answer any questions. We will be sending you a notification of the conference time by next week.

If you have any questions regarding this information, please contact NIBI Customer Support at (507) 388-0250.

Sincerely,

NATIONAL INDEPENDENT BILLING, INC.

Vicki Sutherland  
Business Support Supervisor

3-13-2000



A Subsidiary of Hickory Tech Corporation

215 East Hickory Street P.O. Box 772 Mankato, MN 56002-0772

March 8, 2000

Ph: 507.625.1691

Fax: 507.625.1057

www.nibinc.com

Ms. Kathryn Fox  
Waldron Telephone Company  
119 South Main Street  
P.O. Box 197  
Waldron, MI 49288-0197

Dear Kathryn:

The FCC adopted the Truth in Billing Order that will be applicable to all telecommunications wireline carriers. FCC has mandated Truth in Billing to be implemented on April 1, 2000 by all NIBI customers. NIBI acknowledges Truth in Billing and is taking action to help its NIBI customers move toward compliance with the Truth in Billing Regulations. In order to help all NIBI customers move toward becoming compliant, NIBI will provide the option to add enhancements to all current systems.

An assessment, NECA Time and Cost Estimate form, and Illuminet surveys are being provided to all NIBI customers. The assessment provides information on the enhancements to NIBI systems as part of the Truth in Billing requirements. The NECA Time and Cost Estimate and Illuminet surveys will provide the information that NIBI customers may be required to submit. The amount provided for NECA's Time and Cost Estimate reflects only the amount it will take NIBI to enhance systems as part of Truth in Billing requirements. If needed, your additional costs may be added to NECA's Time and Cost Estimate.

Currently, NIBI is updating the Telco Billing and Rating systems to be able to process the 020-A module (used for notification on any Service Provider change). NIBI has set the implementation date for 020-A module use to June 1, 2000.

If any NIBI customers will not be compliant as of April 1, 2000 as mandated by the FCC, a bill insert will need to be provided in all customer bills stating the Truth in Billing Regulations, that the bills are not yet compliant and the reason(s) for not being compliant. For EasyTel, and EasyTel2000, a 34-line user-defined statement message is available for creating the billing insert. If the statement message is used and it creates an additional page, the NIBI charge for printing the additional page is \$.05. If any NIBI customer wishes to use a pre-printed billing insert for customer notification, the cost will be \$.05 per insert plus the cost of producing the billing insert.

NIBI is not guaranteeing compliance with Truth in Billing Regulations, but is striving to help its customers move towards becoming compliant. If any NIBI customer needs to submit a waiver to the FCC for the April 1, 2000 requirements, it will be their responsibility to contact the FCC for waiver submission information.

As a way of helping NIBI customers understand Truth in Billing, NIBI will be setting up conference calls to help answer any questions. We will be sending you a notification of the conference time by next week.

If you have any questions regarding this information, please contact NIBI Customer Support at (507) 388-0250.

Sincerely,

NATIONAL INDEPENDENT BILLING, INC.

Vicki Sutherland

Business Support Supervisor



A Subsidiary of Hickory Tech Corporation

215 East Hickory Street P.O. Box 772 Mankato, MN 56002-0772

March 8, 2000

Ph: 507.625.1691

Fax: 507.625.1057

[www.nibinc.com](http://www.nibinc.com)

Mr. David Fox  
Westphalia Telephone Company  
109 E. Main  
Box 327  
Westphalia, MI 48894

Dear David:

The FCC adopted the Truth in Billing Order that will be applicable to all telecommunications wireline carriers. FCC has mandated Truth in Billing to be implemented on April 1, 2000 by all NIBI customers. NIBI acknowledges Truth in Billing and is taking action to help its NIBI customers move toward compliance with the Truth in Billing Regulations. In order to help all NIBI customers move toward becoming compliant, NIBI will provide the option to add enhancements to all current systems.

An assessment, NECA Time and Cost Estimate form, and Illuminet surveys are being provided to all NIBI customers. The assessment provides information on the enhancements to NIBI systems as part of the Truth in Billing requirements. The NECA Time and Cost Estimate and Illuminet surveys will provide the information that NIBI customers may be required to submit. The amount provided for NECA's Time and Cost Estimate reflects only the amount it will take NIBI to enhance systems as part of Truth in Billing requirements. If needed, your additional costs may be added to NECA's Time and Cost Estimate.

Currently, NIBI is updating the Telco Billing and Rating systems to be able to process the 020-A module (used for notification on any Service Provider change). NIBI has set the implementation date for 020-A module use to June 1, 2000.

If any NIBI customers will not be compliant as of April 1, 2000 as mandated by the FCC, a bill insert will need to be provided in all customer bills stating the Truth in Billing Regulations, that the bills are not yet compliant and the reason(s) for not being compliant. For EasyTel, and EasyTel2000, a 34-line user-defined statement message is available for creating the billing insert. If the statement message is used and it creates an additional page, the NIBI charge for printing the additional page is \$.05. If any NIBI customer wishes to use a pre-printed billing insert for customer notification, the cost will be \$.05 per insert plus the cost of producing the billing insert.

NIBI is not guaranteeing compliance with Truth in Billing Regulations, but is striving to help its customers move towards becoming compliant. If any NIBI customer needs to submit a waiver to the FCC for the April 1, 2000 requirements, it will be their responsibility to contact the FCC for waiver submission information.

As a way of helping NIBI customers understand Truth in Billing, NIBI will be setting up conference calls to help answer any questions. We will be sending you a notification of the conference time by next week.

If you have any questions regarding this information, please contact NIBI Customer Support at (507) 388-0250.

Sincerely,

NATIONAL INDEPENDENT BILLING, INC.

Vicki Sutherland  
Business Support Supervisor